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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

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SEAN F. McAVOY, CLERK
DEPUTY
SPOKANE, WASHINGTON

9
10 UNITED STATES DISTRICT COURT
11 FOR THE EASTERN DISTRICT OF WASHINGTON
12

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 CHARICE MARIE UNRUH,

17 Defendant.

2:21-CR-108-WFN
INDICTMENT

Vio.: 21 U.S.C. § 843(b),
Unlawful Use of U.S. Mails
(Count 1)

18 U.S.C. § 1708,
Possession of Stolen Mail
(Counts 2 - 23)

18 U.S.C. § 1704,
Reproduction of Postal Keys
(Count 24)

21 U.S.C. § 853, 18 U.S.C. §§
981(a)(1)(C), 982(a)(2)(B),
1028(b)(5), 28 U.S.C. § 2461(c)
Forfeiture Allegations

25 The Grand Jury charges:

26
27 COUNT 1

28 Beginning on or about March 29, 2021, and continuing until on or about
April 2, 2021, in the Eastern District of Washington, the Defendant, CHARICE

INDICTMENT – 1

MARIE UNRUH, did knowingly and intentionally use the United States mail, a communications facility, in committing, causing, and facilitating a felony under Title 21, to wit: distribution of methamphetamine, in violation of 21 U.S.C. § 841(a)(1); all in violation of 21 U.S.C. § 843(b).

COUNTS 2-23

On or about April 2, 2021, in the Eastern District of Washington, the Defendant, CHARICE MARIE UNRUH, did unlawfully have in her possession any letter, postal card, package, bag, or mail, or any article or thing contained therein, which had been stolen, taken, embezzled or abstracted from an authorized depository for mail matter, knowing the same to have been stolen, taken, embezzled or abstracted, as specified below, each article constituting a separate charge, in violation of 18 U.S.C. § 1708:

Count	Victim	Description
2	B.W.	Mail
3	J.W.	Mail (containing paystub)
4	J.W.	Mail (containing 1099 Tax Form)
5	G.T.	Mail (containing 1099-NEC Tax Form)
6	D.T.	Mail (containing 1099-NEC Tax Form)
7	T.T.	Mail (containing 1095-C Tax Form)
8	R.S.	Mail (containing W-2 Tax Form)
9	E.R.	Mail (containing a check)
10	N.N.	Mail (containing W-2 Tax Form)
11	L.M.	Various Items of U.S. Mail
12	J.M.	Mail (containing 1099 Tax Form)
13	K.K.	Mail (containing W-2 Tax Form)
14	R.K.	Mail (containing W-2 Tax Form)

15	B.J.	Mail (containing financial trust instrument)
16	C.J. & A.J.	Mail (containing automobile insurance cards)
17	J.F.	Mail (containing 1099 Tax Form)
18	T.D.	Mail (containing mortgage statement)
19	M.D.	Mail (containing 1099 Tax Form)
20	M.C.	Mail (containing 1095 Tax Form)
21	N.B.	Mail (containing 1099 Tax Form)
22	B.M. & H.M.	Mail (containing insurance cards and statements)
23	L.M.	Mail (containing 1099 Tax Form)

COUNT 24

On or about April 2, 2021, in the Eastern District of Washington, the Defendant, CHARICE MARIE UNRUH, did knowingly and unlawfully make, forge, and counterfeit, a key adopted by the Postal Service and in use on bags, lock boxes, lock drawer and other authorized receptable for the deposit of the mail matter, with the intent to unlawfully and improperly use, sell, and otherwise dispose of the same, and to cause the same to be unlawfully and improperly used, sold and disposed of, in violation of 18 U.S.C. § 1704.

NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

The allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of 21 U.S.C. §§ 841(a)(1), 843(b), as set forth in Count 1 of this Indictment, the Defendant, CHARICE MARIE UNRUH, shall forfeit to the United States of America, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result

1 of such offense and any property used or intended to be used, in any manner or part, to
2 commit or to facilitate the commission of the offense.

3 If any of the property described above, as a result of any act or omission of
4 the Defendant:

- 5 a. cannot be located upon the exercise of due diligence;
- 6 b. has been transferred or sold to, or deposited with, a third party;
- 7 c. has been placed beyond the jurisdiction of the court;
- 8 d. has been substantially diminished in value; or
- 9 e. has been commingled with other property which cannot be divided
10 without difficulty,

11
12 the United States of America shall be entitled to forfeiture of substitute property
13 pursuant to 21 U.S.C. § 853(p).

14 Pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), upon conviction
15 of an offense(s) in violation of 18 U.S.C. § 1708, as set forth in Counts 2-23 of this
16 Indictment, the Defendant CHARICE MARIE UNRUH, shall forfeit to the United
17 States of America any property, real or personal, which constitutes or is derived from
18 proceeds traceable to the offense(s), all pursuant to 18 U.S.C. § 981(a)(1)(C) and 28
19 U.S.C. § 2461(c).

20 If any of the property described above, as the result of any act or omission of the
21 Defendant:

- 22 a. cannot be located upon the exercise of due diligence;
 - 23 b. has been transferred or sold to, or deposited with, a third party;
 - 24 c. has been placed beyond the jurisdiction of the court;
 - 25 d. has been substantially diminished in value; or
 - 26 e. has been commingled with other property which cannot be divided
27 without difficulty,
- 28

1 the United States shall be entitled to forfeiture of substitute property pursuant to 21
2 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

3 DATED: this 17th day of August, 2021.

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8 
9 Joseph Harrington
10 Acting United States Attorney

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12 
13 Caitlin Baunsgard
14 Assistant United States Attorney